

MASTER MATERIALS LICENSE APPLICATION CHECKLIST

I. Applicant Information

Applicant Name:	Application Date:
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License No.:	Docket No.:	Mail Control No.:
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Mailing Address:

Point of Contact:

Name	Phone (Voice)	Phone (Fax)	E-mail

II. Issuance Criteria for a Master Materials License (1.3)

Item	Criteria	Yes	No
1.	Applicant meets the requirements of 10 CFR 30.33?		
2.	Applicant currently employs a centralized program to control activities involving the use of byproduct materials under specific licenses of broad scope and limited scope? Program in place for ____ years.		
3.	Applicant has an acceptable regulatory performance record, based on NRC licensing and inspection of prior activities for the last 5 years?		
4.	Applicant's use of licensed material for last 5 years has required a variety of licenses and radionuclides, and the operational flexibility to cover numerous uses, users, and locations in multiple locations (typically multiple NRC Regions)?		

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III. Prelicensing Conference and Readiness Review (1.5)

Prelicensing Scheduled Date(s)			
Conference(s) Conducted			
Readiness Review Scheduled Date			
Readiness Review Completed			
	Acceptable	Unacceptable	Weak
Operational and administrative performance of the centrally-controlled Radiation Safety Program for:			
1. Management oversight, document management, and radiation control procedures;	_____	_____	_____
2. Status of the materials inspection program;	_____	_____	_____
3. Technical quality of inspections;	_____	_____	_____
4. Technical staffing and training;	_____	_____	_____
5. Technical quality of licensing actions; and	_____	_____	_____
6. Responses to incidents and allegations.	_____	_____	_____

NOTE: Attach a copy of the prelicensing visit and readiness review reports.

Comments:

MML Applicant: _____

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IV. Review of Application (2.0)

A. Letter of Understanding (2.1)

Letter of Understanding Issues	Yes	No
Applicant submitted proposed LOU?		
LOU adequately addresses all required issues?		
– Investigations of allegations	___	___
– Enforcement activities	___	___
– Permit termination and decommissioning	___	___
– Use of byproduct material for which NRC has not published guidance	___	___
– Waste incineration	___	___
– Reporting and notification	___	___
– Exemptions to regulations	___	___
– Environmental assessment reports	___	___
– Decommissioning financial assurance	___	___
– Emergency contingency plans	___	___
Others:		

Comments on the LOU:

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Comments on the LOU:

B. Licensing and Enforcement History (2.2)

The reviewer should contact other license reviewers both inside and outside the Region to discuss the applicant’s historical proficiency at completing license applications. The reviewer should also review the inspection history for the applicant’s specific licenses and compare the results of these inspections, by program code, to the total NRC licensee population.

Applicant Performance Indicators (last 5 years)	Yes	No
Proficient completion of license applications?		
Timely and effective communication at all organizational levels on Radiation Safety Program issues?		
Self identification and correction of generic safety issues and regulatory compliance?		
Significant number of employee safety concerns expressed to NRC that were not adequately addressed by applicant?		
Inspection history indicative of good performer based on number of inspections that resulted in no cited violations, notices of violations, or escalated enforcement?		
Frequent NRC findings with significant programmatic implications?		
Number of escalated enforcement cases that involved management oversight issues significant?		
Number and nature of recurrent violations significant?		
Number of escalated enforcement cases that involved repeat violations significant?		
Responses to violations are timely, comprehensive, and effective?		

Comments on applicant licensing and inspection performance:

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Item	Yes	No
Applicant specified adequate RCPO address?		
Applicant indicated location of docketed permittee files for the master materials licensee is different from location of RCP Office? (The actual location should be provided in Section 3.9.)		
Applicant specified locations of all its proposed permittees?		
All locations are under the control of the applicant's Federal control? (Check for consistency with response to Section 3.10.2.) (If no, describe in the comments section and coordinate with the Office of the General Counsel before issuing the MML.)		
Applicant identified facilities designed or established for special uses? (If yes, briefly describe facilities in comments section and confirm appropriate training and experience information is provided in Section 3.8.)		
Applicant will authorize permittee use at temporary job sites? (If yes, briefly describe types of use in comments section.)		
Applicant will use radioactive material in field studies? (If yes, briefly describe types of use in comments section and coordinate to see if an environmental assessment is needed prior to issuance of the MML.)		
Applicant identified permittees that intend to use radioactive material at facilities and sites (other than temporary job sites) that are not located at the MML's Federally-controlled facility. (If yes, describe in the comments section and coordinate with the Office of the General Counsel before issuing the MML.)		

Comments on Locations of Use:

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D. NRC Form 313, Item 4: Person to be Contacted About Application (3.4)

Item	Yes	No
Applicant specified point of contact?		
Applicant specified point of contact's telephone number?		

E. NRC Form 313, Item 5: Material to be Possessed (3.5)

Items for Material to be Possessed	Yes	No
Applicant requested possession of byproduct material?		
Applicant requested possession of source material?		
Applicant requested possession of special nuclear material?		
Applicant adequately described each radionuclide class by chemical or physical form, quantity in curie, etc.?		
Applicant requested possession of radionuclides to be listed as specific line items? (If yes, describe in comments section.)		
Applicant's request categorized into general areas of use?		
Applicant described uses by individuals other than the applicant's employees or contract employees? (If yes, describe in the comments section.)		
Applicant described facilities or permittees that may possess quantities of licensed materials requiring financial assurance (10 CFR 30.35)? (If yes, describe in comments section.)		
Applicant described facilities or permittees that may possess quantities of licensed materials requiring an emergency plan (10 CFR 30.32)? (If yes, describe in comments section.)		

Comments on Material to be Possessed

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F. NRC Form 313, Item 6: Purpose of Use of Licensed Material (3.6)

Items on Purpose of Use of Licensed Material	Yes	No
Applicant described, in general terms, purposes for which it will use licensed material?		
Applicant explained why it needed an MML?		
The uses specified are consistent with the applicant's prior licensed activities?		
The uses specified are categorized in a classification scheme similar to NRC's licensing program codes?		
Applicant included a list of total possession limits for each category of use requested?		
Applicant requested possession and use of licensed materials which should be subject to a separate license (e.g., authorization to manufacture or commercially distribute license material)? (If yes, describe in comments section.)		
Applicant has permittees that desire to perform field studies? (If yes, describe in comments section and coordinate with the Office of the General Counsel prior to issuance of the MML.)		
Applicant desires to authorize field studies that are not eligible for the categorical exclusion pursuant to 10 CFR 51.22? (If yes, describe in comments section and coordinate with the appropriate NRC Offices to see if an environmental assessment is needed prior to issuance of the MML.)		

Comments on Purpose of Use of Licensed Material

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G. NRC Form 313, Item 7: Individuals Responsible for the Radiation Safety Program (3.7)

Senior Management (3.7.1)	Yes	No
Applicant's management controls and oversight are adequate to ensure that permitted activities are properly conducted?		
Applicant's senior management have established administrative controls and provisions relating to organization and management, including management review necessary to assure safe operations?		
Senior management has delegated, in writing, sufficient authority, organizational freedom, and management prerogative, to communicate with and direct MML personnel at all levels regarding NRC regulations, MML license provisions, and permit conditions?		
Applicant's senior management has devoted sufficient financial resources (i.e., funds, equipment, personnel, materials) to support the Radiation Control Program at all levels?		
The applicant described the senior management oversight and mechanisms used by management to ensure adequate control over MML licensed activities?		
Senior management oversight activities include: <ul style="list-style-type: none"> – Membership and active participation in MRSC meetings – Oversight of RCPD and support staff – Annual audits of the program to assure safe operations and regulatory compliance 	___ ___ ___	___ ___ ___
The applicant submitted an organization chart depicting its management structure, reporting paths, and flow of authority?		

Comments on Senior Management

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Master Radiation Safety Committee (3.7.2)	Yes	No
<p>The applicant's description of its MRSC indicates that:</p> <ul style="list-style-type: none"> - It functions to provide guidance and information on the RCP to senior executive management - It ensures that adequate resources are provided by management - It provides oversight to the RCPD in the development, implementation, and maintenance of the RCP 	<p>___</p> <p>___</p> <p>___</p>	<p>___</p> <p>___</p> <p>___</p>
<p>MRSC membership includes:</p> <ul style="list-style-type: none"> - A senior manager from the executive management organization to serve as the Chairman - Managers from major divisions or organizational elements that represent the permittee community that are capable of establishing RCP policies - The RCPD who serves as the Executive Secretary - A manager from the applicant's finance organization - Managers responsible for establishing and implementing major program activities - Managers that represent permitting and inspecting organizations - Representatives of occupationally exposed workers 	<p>___</p> <p>___</p> <p>___</p> <p>___</p> <p>___</p> <p>___</p> <p>___</p>	<p>___</p> <p>___</p> <p>___</p> <p>___</p> <p>___</p> <p>___</p> <p>___</p>
<p>The applicant identified all MRSC members by position title and job description?</p>	<p>___</p>	<p>___</p>
<p>The applicant's procedures to ensure that each MRSC member has the education, training, experience and knowledge necessary to address Radiation Control Program issues are adequate?</p>	<p>___</p>	<p>___</p>
<p>The applicant identified the Chairman of the MRSC?</p>	<p>___</p>	<p>___</p>
<p>The applicant provided assurances that the chairman has full authority to commit licensee resources to support the conduct of the MML?</p>	<p>___</p>	<p>___</p>
<p>The applicant provided documentation that the individual is qualified to chair the committee?</p>	<p>___</p>	<p>___</p>

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Master Radiation Safety Committee (3.7.2)	Yes	No
<p>The MRSC Chairman is empowered to:</p> <ul style="list-style-type: none"> - Set the agenda - Direct committee meetings - Determine the existence of a quorum - Verify the minutes - Summarize the committee’s position regarding decisions - Sign all official documents of the committee - Appoint a temporary replacement chairperson (not the executive secretary) when the chairperson is not present - Vote 	<p>— — — — — — — —</p>	<p>— — — — — — — —</p>
<p>Description of the Executive Secretary’s duties indicates this individual:</p> <ul style="list-style-type: none"> - Serves as a liaison between the MRSC and the RCP staff - Informs the Chairperson of staff commitments and resources - Assists the Chairperson in preparing the agenda - Advises the committee of current regulations, and proposed changes in NRC regulations and policies - Provides the committee with quarterly reports on the status of the program - Prepares an annual audit report including overall conduct, result of the program performance compared to regulatory requirements and commitments, review of permitting actions, inspection reports, and enforcement actions 	<p>— — — — — —</p>	<p>— — — — — —</p>

Comments on Master Radiation Safety Committee

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Other RCP Staff (3.7.4)	Yes	No
Applicant's requirements for professional staff qualifications include: <ul style="list-style-type: none"> – Sufficient education, training, and experience in the physical and/or life sciences? – Bachelor's degree, or equivalent training and experience? – At least 40 hours training in: <ul style="list-style-type: none"> ▶ the safe handling of radioactive materials? ▶ the characteristics of ionizing radiation? ▶ units of radiation dose and quantities? ▶ radiation detection instrumentation? ▶ biological hazards of exposure to radiation appropriate to the type and forms of byproduct to be used? – Additional training commensurate with the types of hazards and technology to be permitted? 	_____ _____ _____ _____ _____ _____ _____	_____ _____ _____ _____ _____ _____ _____
Applicant provided training and experience guidance for staff members whose primary duties include reviewing/issuing permits or conducting inspections?		
<ul style="list-style-type: none"> – It was adequate? 	_____	_____
<ul style="list-style-type: none"> – It required staff to meet training qualifications equivalent to NRC license reviewers and inspectors (NRC Inspection Manual Chapter (IMC-1246))? ... 	_____	_____

Comments on Other RCP Staff

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H. NRC Form 313, Item 8: Training and Experience for Individuals Working in or Frequenting Restricted Areas

Training and Experience Items (3.8)	Yes	No
Applicant uses licensed materials at special use facilities?		
Applicant's special use facilities require site access training?		
Applicant described training and experience required of individuals who work at special use facilities?		
Applicant's training and experience requirements adequate?		

Comments on Training and Experience Requirements for Special Use Facilities

I. NRC Form 313, Item 9, Facilities and Equipment

Facilities and Equipment (3.9)	Yes	No
Applicant listed the location of all facilities used by the RCP staff to carry out its activities?		
Applicant described all facilities used by the RCP staff to carry out its activities?		
Applicant stated where the master or central permittee files and all other docketed and required files and records will be maintained?		
Applicant provided a list of laboratory equipment or other devices necessary for conducting the inspection of permittees?		
Applicant described the uses of laboratory equipment or other devices necessary for conducting the inspection of permittees?		

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Radiation Control Program – An Overview (3.10.1)	Yes	No
Each narrative description for the above addressed: <ul style="list-style-type: none"> – Program authorities and responsibilities – Communications – Quality control surveillance – Program audits – Procurement – Staff selection and qualification – Information dissemination, document control and retrieval, etc. – Other considerations essential to the successful implementation of the RCP .. 	_____ _____ _____ _____ _____ _____ _____ _____	_____ _____ _____ _____ _____ _____ _____ _____
The overview written administrative control procedures for the RCP are sufficient to describe how management oversight for program activities will be carried out?	_____	_____
The description of the RCP included a narrative overview description of the licensing and inspection program?	_____	_____
The narrative description of the licensing and inspection program addressed: <ul style="list-style-type: none"> – Program authorities and responsibilities – Communications – Quality control surveillance – Program audits – Procurement – Staff selection and qualification – Information dissemination, document control and retrieval, etc. – Other considerations essential to the successful implementation of the RCP .. 	_____ _____ _____ _____ _____ _____ _____ _____	_____ _____ _____ _____ _____ _____ _____ _____

Comments on the Radiation Control Program – An Overview

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Previous Licenses (3.10.2)	Yes	No
Applicant provided list of materials licenses to be included under the MML?		
All licensees are part of the Applicant's Federal agency? (If no, explain in the comment section and coordinate with the Office of the General Counsel before issuing the MML.)		
Materials licenses listed are authorized for inclusion in the MML? (If no, describe in the comment section.)		

Comments on Previous Licenses

Material Control and Accountability (3.10.3)	Yes	No
Applicant described its inventory control and accountability system for licensed material?		
It included procedures for properly transferring material throughout the applicant's organization, including its movement among facilities?		
It included procedures for properly controlling material throughout the applicant's organization, including its movement among facilities?		
It included procedures for properly accounting for material throughout the applicant's organization, including its movement among facilities?		
The inventory and control system is adequate to ensure that licensed possession limits are not exceeded?		
The inventory and control system is adequate to account for material throughout the applicant's organization?		

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Comments on Material Control And Accountability

Regulatory Conformance (3.10.4)	Yes	No
Applicant committed to implement regulations consistent with and no less restrictive than NRC regulations?		
Applicant confirms that licensing and inspection programs will be implemented in accordance with NRC licensing and inspection criteria (i.e., NRC regulations, policies and guides) or will submit any alternative procedures?		
– If above answer was no, applicant provided alternative procedures.		
Applicant submitted or otherwise described its policies, procedures, directives, and guides related to the implementation and oversight of its RCP?		
Applicant identified those NRC policies, procedures, and guides which will be incorporated into the RCP in their entirety?		
If NRC guidance is used, applicant provided procedures to ensure that the program is updated as NRC guidance is changed, and that staff is trained in current NRC guidance.		

Comments on Regulatory Conformance

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Updating RCP Documents (3.10.5)	Yes	No
Applicant has established procedures for appropriate and timely updating of its regulations, policies, procedures, and guides to ensure conformance with NRC regulations, policies, procedures, and guides?		
Applicant submitted or otherwise described these procedures?		
Applicant's procedures/description adequate?		
Applicant confirmed that changes to its regulations, policies, procedures, and guides which involve a material change from that submitted in its original application or subsequent amendments will be submitted for review as a part of a license amendment request?		

Comments on Updating RCP Documents

Management Support and RCP Structure (3.10.6)	Yes	No
Applicant has sufficient operating funds to support RCP needs (e.g., financial assurance, travel, training, equipment, administrative costs, etc.)?		
RCP supported with sufficient staffing and technical expertise?		
RCP located within the applicant's organization at a level equivalent with other comparable health and safety programs?		
RCPD has access to highest levels of applicant's management?		
Applicant submitted organizational chart and description depicting:		
– Management structure	___	___
– Reporting paths	___	___
– Flow of authority and control of finances	___	___
– Geographical location of all management and RCP staff components	___	___

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Comments on Management Support and RCP Structure

Radiation Control Program – Administrative Control Processes (3.10.7)	Yes	No
The applicant provided written administrative control processes?		
The administrative control processes addressed:		
– Program authorities and responsibilities	___	___
– Communications	___	___
– Quality control surveillance	___	___
– Program audits	___	___
– Procurement	___	___
– Staff selection and qualification	___	___
– Information dissemination, document control and retrieval, etc.	___	___
– Other considerations essential to the successful implementation of the RCP ..	___	___
The applicant’s administrative control procedures were related to administrative controls and provisions for:		
– Organization and management	___	___
– Procedures	___	___
– Recordkeeping	___	___
– Material control and accounting	___	___
– Management review	___	___
Written administrative control processes are sufficient in:		
– detail	___	___
– clarity	___	___
– specificity	___	___
to describe how management oversight for program activities will be carried out?		

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Comments on Radiation Control Program Administrative Control Processes

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Master Radiation Safety Committee (3.10.8)	Yes	No
Applicant identified and described any existing boards or entities that it uses to support the MRSC?		

Comments on the Master Radiation Safety Committee

Radiation Control Program Director (3.10.9)	Yes	No
Applicant provided a copy of the written delegation of authority from the senior executive manager to the RCPD?		
Applicant provided a copy of the written a description of the RCPD's responsibilities?		
RCPD responsibilities and authorities include, but are not limited to:		
– Management and control of the RCP	___	___
– Serving as the Executive Secretary of the MRSC	___	___
– Conducting day-to-day operations of the RCP and issuing permits in accordance with procedures approved by the MRSC	___	___
– Serving as the routine point-of-contact between the MML licensee and NRC for matters concerning the MML	___	___
– Informing the MRSC and senior executive management regarding the status of the RCP	___	___
– Implementing the MRSC's enforcement sanctions	___	___
– Stopping work activities which may pose undue risk or hazard or which may violate conditions of the license or the NRC regulations	___	___
– Reviewing all radiological incidents and recommending corrective actions to the MRSC	___	___
Applicant provided documentation to show that the RCPD has access to the highest levels of MML management?		
Applicant described the measure of administrative and financial control the RCPD has over permitting and inspection personnel?		

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Comments on the Radiation Control Program Director

Permitting and Inspection Staff (3.10.10)	Yes	No
The applicant's description of the permitting and inspection staff indicates that this staff will:		
– Provide guidance to licensee organizations in the preparation of requests for permits	—	—
– Be responsible for providing content of NRC generic communications to appropriate permittees in a timely manner	—	—
– Review permit applications for completeness and compliance with current regulations, policies and guides	—	—
– Prepare permits and forward to the MRSC for review and signature	—	—
– Perform inspections to assess compliance with current licensee and NRC regulations, policies, and guides and provisions of the MML and specific permits	—	—
– Prepare reports of inspection results, and forward reports of non-compliance to the MRSC	—	—
– Conduct technical assistance visits, as necessary	—	—
– Conduct pre-licensing visits	—	—
– Respond to incidents	—	—

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Permitting and Inspection Staff (3.10.10)	Yes	No
If the RCP staff are not co-located, did the applicant describe how it will:		
– Effectively manage the day to day operations of the RCP?	___	___
– Respond to events at permittee facilities?	___	___
– Maintain uniformity of program implementation?	___	___
– Maintain daily communications?	___	___
– Ensure consistency of guidance provided to permittees?	___	___
– Provide training to RCP staff?	___	___
– Monitor and evaluate RCP staff performance?	___	___

Comments on the Permitting and Inspection Staff

Radiation Control Program Internal Procedures (3.10.11)	Yes	No
The applicant has confirmed it has established written internal procedures which:		
– Assure that the MML satisfies NRC requirements and criteria	___	___
– Assure the RCP staff performs its duties as required	___	___
– Provide a high degree of uniformity and continuity in regulatory practices ...	___	___
– Address internal processing of permit applications, inspection policies and procedures, decommissioning, and other functions required of the program ..	___	___
– Require that the MRSC receive quarterly reports from the RCP staff on the status of the program	___	___
– Require that the MRSC receive a report on the annual audit of the program to include overall conduct, result of the program performance compared to regulatory requirements and commitments, review of permitting actions, inspection reports, and enforcement actions	___	___

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Comments on the RCP Internal Procedures

Management and Master Radiation Safety Committee Audits (3.10.12)	Yes	No
The applicant described the process used by senior executive management to ensure its awareness of NRC regulations, the provisions of the license, and the compliance status of the RCP?		
The applicant provided a copy of the senior executive management’s audit program to audit the performance of the RCP and staff?		
The applicant provided a copy of the MRSC’s audit program to audit the performance of the RCP office, RPCD, and permit review and inspection staff?		
The applicant’s MRSC will conduct interactive management audits and evaluations of the RCP office’s performance, including the RCPD’s and will provide the results of these audits to senior executive management?		
The applicant has established a system to: <ul style="list-style-type: none"> – Qualify permit inspectors that is similar to NRC’s inspector qualification system – Audit each inspector’s performance, through field accompaniments on an annual basis – Qualify permit reviewers that is similar to NRC’s license reviewer qualification system – Audit each permit reviewer’s actions to assess performance and assure appropriate and consistent policies and guides 	___ ___ ___ ___	___ ___ ___ ___

Comments on Management and MRSC Audits

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Comments on Management and MRSC Audits		

Permitting Procedures (3.10.13)	Yes	No
The applicant:		
<ul style="list-style-type: none"> - Provided copies of its permitting procedures, policies and guides OR - Committed to utilizing NRC licensing procedures, policies, and guides; listed those NRC documents used; and provided copies of its documents that differ from NRC documents 	___	___
Applicant provided standard license conditions?		
<ul style="list-style-type: none"> - The applicant committed to use NRC’s standard license conditions for its permit conditions? 	___	___
<ul style="list-style-type: none"> - Applicant committed to not use custom conditions that are less restrictive than any applicable NRC conditions, requirements, or criteria? 	___	___
The applicant specified its timeliness goals applied to the issuance of permits and the updating of its permitting guidance as updates are received from NRC?		
Applicant described its document management procedures?		

Comments on the Permitting Procedures		

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Permittee Minimization of Contamination Program (3.10.14)	Yes	No
Applicant described how facility design and procedures for operation will:		
– Minimize, to the extent practicable, contamination of the permittee’s facilities and the environment	___	___
– Facilitate eventual decommissioning	___	___
– Minimize, to the extent practicable, the generation of radioactive waste	___	___
Applicant’s procedures are adequate?		

Comments on Permittee Minimization of Contamination Program

Permit Termination and Decommissioning of Permit Activities (3.10.15)	Yes	No
Applicant provided its permit termination procedures or committed that it will terminate its permits in accordance with NRC regulations, policies, and guides, as provided for in the LOU?		
Applicant provided decommissioning procedures or committed that permit facilities will be decommissioned as described in the NRC IMC 2605 and handbook, as provided for in the LOU?		
Applicant confirmed that copies of permit termination requests and permit decommissioning plans will be provided to NRC?		
Applicant confirmed that specific permit decommissioning plans will be submitted to NRC, when requested, for review and approval prior to final approval by the MML RCP?		
Applicant’s permit termination program was adequate?		
Applicant’s decommissioning program was adequate?		

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Comments on Permit Termination and Decommissioning of Permit Activities

Financial Assurance (3.10.16)	Yes	No
Applicant described how it will meet the decommissioning financial assurance requirements described in 10 CFR 30.35?		
Applicant described its program for ensuring adequate funds to decommission all its permitted facilities are established and maintained?		
Applicant's financial assurance program is adequate?		

Comments on Financial Assurance

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Comments on the Inspection and Enforcement Procedures

Incident/Emergency Response Procedures (3.10.18)	Yes	No
Applicant submitted its RCP Office' incident/emergency response procedures?	—	—
The RPC Office's incident/emergency response procedures include, but are not limited to, the following for both work-hour and off-hour incidents:		
<ul style="list-style-type: none"> – RCP management oversight responsibilities – Initial response actions and responsibilities, including immediate safety for: <ul style="list-style-type: none"> ▶ RCP management ▶ RCP staff ▶ Permittee – Identifies persons responsible for: <ul style="list-style-type: none"> ▶ Initiating response action (includes notifications) ▶ Conducting operations ▶ Conducting cleanup ▶ Precautions for people and property at permittee facilities ▶ Area and permittee facility access control and security ▶ Mechanisms and responsibilities for notifying RCP Office staff and external authorities ▶ Provisions for medical and offsite agency assistance ▶ A description of emergency response equipment available for use by the RCP Office staff ▶ Need for onsite review of events 	—	—
Applicant provided Emergency Plan(s) in accordance with 10 CFR 30.32(i)?	—	—

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Comments on Incident/Emergency Response Procedures

Procedures for Handling Allegations (3.10.19)	Yes	No
Applicant confirmed it will follow NRC's procedures for handling allegations OR Provided equivalent procedures for handling allegations that are referred to the MRSC	___	___
Applicant submitted its procedures for handling and documenting employee concerns?		
Applicant described the training it will provide to all employees to assure they understand their right to contact NRC directly about radiation safety or regulatory issues?		
Applicant's program for responding to employee radiation safety concerns and providing training is adequate?		

Comments on the Procedures for Handling Allegations

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K. NRC Form 313, Item 11: Waste Management

Waste Management (3.11)	Yes	No
Applicant described the methods its permittees will use for disposal of radioactive waste?		
Applicant's disposal methods are adequate and in accordance with regulations?		
Applicant's proposed disposal methods include means other than transfers to a recipient (usually a waste disposal service company or the original supplier) who is properly licensed to receive such waste in accordance with 10 CFR 20.2001(a), decay-in-storage, disposal of materials that contain radioactivity from hydrogen-3 and carbon-14 in scintillation counting media and in animal tissue in concentrations of 0.05 microcurie or less per gram, subject to certain restrictions stated in 10 CFR 20, 2005, and release of radioactive materials into air and water in conformance with 10 CFR 20.1302 and 20.2003?		
Applicant described other disposal methods and these methods were adequate?		
Applicant described the locations, conditions, and current status of former burial sites?		

Comments on Waste Disposal